

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

UNIVERSAL TRADING & INVESTMENT
CO., INC.

V.

YULIA TYMOSHENKO
ALEXANDER TYMOSHENKO
ANDREY VAVILOV

and DOES from 1 to 10

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CIVIL ACTION
NO. 11-CV-7877 (PAC)

DECLARATION OF JAMES P. GOLDEN

JAMES P. GOLDEN hereby declares under penalty of perjury pursuant to 28

U.S.C. § 1746 that the following is true and correct:

1. I am a shareholder in the firm of Hamburg & Golden, P.C., counsel for defendant Andrey Vavilov, and I submit this declaration in support of Mr. Vavilov's motion to dismiss the complaint.

2. The following true and correct exhibits are attached:

1. Declaration of Andrey Vavilov in support of dismissal for lack of personal jurisdiction
2. Amended Complaint
3. Universal Trading & Investment Co., Inc. v. Tymoshenko, 2012 WL 6186471 (Dec. 12, 2012) (Crotty, J.) (dismissing complaint)
4. Universal Trading & Investment Co., Inc. v. Tymoshenko, 2013 WL 6186471 (April 10, 2013) (Crotty, J.) (granting leave to amend complaint; "Only amendments related to the RICO cause of action will be allowed.")
5. Westlaw search result showing 50 reported opinions involving Universal Trading litigation in the United States

Respectfully submitted,

/s/ Matthew P. Feser

MATTHEW P. FESER
SALISBURY & RYAN
1325 Avenue of the Americas, 7th Fl.
New York, NY 10019
212-977-4660
212-977-4668 (fax)
mf@salisburyryan.com

/s/ James P. Golden

JAMES P. GOLDEN
Pennsylvania I.D. No. 32169
HAMBURG & GOLDEN, P.C.
1601 Market Street, Suite 3310
Philadelphia, PA 19103
215-255-8590
215-255-8583 (fax)
goldenjp@hamburg-golden.com
(Admitted Pro hac vice)

Attorneys for defendant
Andrey Vavilov

Date: October 18, 2013